

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)	
)	Chapter 11
)	
GRIDDY ENERGY LLC, ¹)	Case No. 21-30923 (MI)
)	
Debtor.)	
)	

**CERTIFICATE OF NO OBJECTION TO DEBTOR'S MOTION FOR ENTRY
OF AN ORDER: (A) EXTENDING THE TIME WITHIN WHICH
ACTIONS MAY BE REMOVED AND (B) GRANTING RELATED RELIEF**

1. On June 4, 2021, the debtor and debtor in possession in the above-captioned case (the "Debtor") filed the *Debtor's Motion for Entry of an Order: (a) Extending the Time Within Which Actions May be Removed and (b) Granting Related Relief* [Docket No. 329] (the "Motion"). On the same day, the Motion was served on (i) all parties registered to receive such service via the Court's CM/ECF; and (ii) the parties listed in the Motion. *See* Certificate of Service [Docket No. 333].

2. Responses to the Motion were due by June 25, 2021 (the "Objection Deadline"). A proposed order (the "Proposed Order") granting the relief requested was filed as Exhibit A to the Motion and is attached hereto as Exhibit 1.

3. In accordance with Paragraph 41 of the *Procedures for Complex Chapter 11 Cases in the Southern District of Texas*, the undersigned counsel files this Certificate of No Objection and represents to the Court that (i) more than 24 hours have passed since the Objection Deadline, (ii) the undersigned counsel is unaware of any objections to entry to the Motion, and (iii) the

¹ The last four digits of its federal tax identification number of the Debtor are 1396. The mailing address for the Debtor is PO Box 1288, Greens Farms, CT 06838.

undersigned counsel has reviewed the Court's docket and no objection or response to the Motion appears thereon.

4. Therefore, the Debtor respectfully requests entry of the Proposed Order.

Dated: June 29, 2021
New York, New York

BAKER BOTTS L.L.P.

By: /s/ Chris Newcomb
Robin Spigel (admitted *pro hac vice*)
Robin.Spigel@bakerbotts.com
Chris Newcomb (admitted *pro hac vice*)
Chris.Newcomb@bakerbotts.com
30 Rockefeller Plaza
New York, New York 10012-4498
Telephone: (212) 408-2500
Facsimile: (212) 259-2501

-and-

David R. Eastlake
Texas Bar No. 24074165
David.Eastlake@bakerbotts.com
910 Louisiana Street
Houston, Texas 77002-4995
Telephone: (713) 229-1234
Facsimile: (713) 229-1522

Counsel to the Debtor and Debtor in Possession

Certificate of Service

I certify that on June 29, 2021, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Chris Newcomb